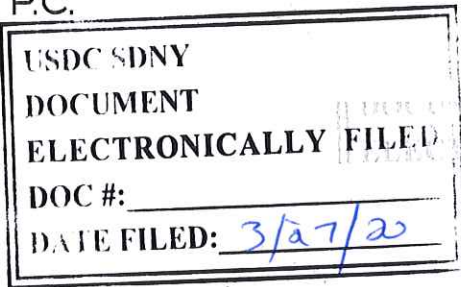


BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW
767 THIRD AVENUE, 26TH FLOOR
NEW YORK, NEW YORK 10017
TELEPHONE: (212) 750-7800
FACSIMILE: (212) 750-3906
E-MAIL: ATTORNEYS@BRAFLAW.COM



BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

March 25, 2020

VIA ECF

Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: United States v. Goldstein, 18 CR 217 (KMW)

Dear Judge Wood:

On March 19, 2020, NYS Governor Andrew Cuomo called on recently retired health care professionals to sign up to be part of a reserve staff to assist area hospitals in responding to the COVID-19 medical crisis. Since that time, counsel and Jeffrey Goldstein have been reaching out to the NYS Office of Professional Management and numerous politicians (including Governor Cuomo's office) to see if there is any way Goldstein can assist in the crisis despite surrendering his medical license following his guilty plea in the above-referenced case. To date, we have received no responses.

In the interim, Goldstein is doing what he can to help by working with Sollis Healthcare (a medical clinic in NYC) to administer COVID-19 tests all over the US. Goldstein—conducting tasks suited for a technician, not a doctor—has helped Sollis Healthcare administer tests in NYC and Long Island. The clinic is now asking Goldstein to help administer tests in Chicago and potentially other US cities. Accordingly, we request a modification of Goldstein's travel restrictions (currently limited to the Southern and Eastern Districts of New York for all purposes and New Jersey and Connecticut for employment purposes) to allow Goldstein to travel in the domestic US to help administer COVID-19 tests. Goldstein will provide his itinerary to Pretrial Services in advance of his trips.

Granted

BRAFMAN & ASSOCIATES, P.C.

We have spoken with the Government and Pretrial Services, and both have no objection to our request. Thank you for your consideration.

Respectfully submitted,

Jacob Kaplan

Jacob Kaplan

cc: Government Counsel (via ECF)
Pretrial Services Officer Winter Pascual (via email)

SO ORDERED: N.Y., N.Y. 3/27/20

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.